| 1 2 3 4 | LAW OFFICE OF DANIEL MARKS DANIEL MARKS, ESQ. Nevada State Bar No. 002003 ADAM LEVINE, ESQ. Nevada State Bar No. 004673 610 South Ninth Street Las Vegas, Nevada 89101 (702) 386-0536: FAX (702) 386-6812 | |
|--|---|--|
| 5 6 | Attorneys for Plaintiff Anthony Russo | |
| 7 | IN THE UNITED STATES DISTRICT COURT | |
| 8 | FOR THE DISTRICT OF NEVADA | |
| 9 | | |
| 10 | DANIEL M. BURGESS, an individual; Case No.: 2:17-cv-00805-GMN-VCF ANTHONY RUSSO, an individual, | |
| 11 | Plaintiff, <u>STIPULATION TO EXTEND THE</u> | |
| 12 | v. <u>DEADLINE FOR FILING OF</u> A <u>PROPOSED</u> DISCOVERY PLAN | |
| 131415 | CLARK COUNTY SCHOOL DISTRICT, a political subdivision; EDWARD GOLDMAN, an individual; JAMES KETSAA, an individual; CHRISTOPHER KLEMP, an individual, | |
| 16 | Defendants. | |
| 17 | | |
| 18 | IT IS HEREBY STIPULATED AND AGREED between the parties, by and through their | |
| 19 | undersigned counsel, the current deadline of Monday, July 10, 2017 to file the Proposed Stipulated | |
| 20 | Discovery Plan and Scheduling Order be extended for a period of 30 days. | |
| 21 | This extension is requested in good faith and not for purposes of delay. The parties are currently | |
| 22 | scheduled for an Early Neutral Evaluation on July 25, 2017 and immediately thereafter Plaintiff | |
| 23 | Anthony Russo's counsel is scheduled for a week-long vacation. | |
| 24 | /// | |

| 1 | This extension will make the Prop | osed Discovery Plan and Scheduling Order due on |
|----|--|---|
| 2 | Wednesday, August 9, 2017. | |
| 3 | DATED this 10th day of July, 2017. | DATED this 10th day of July, 2017. |
| 4 | LAW OFFICE OF DANIEL MARKS | MAIER GUTIERREZ & ASSOCIATES |
| 5 | /a/ Adam Lavina Ena | /c/ Jason P. Majon Esa |
| 6 | /s/ Adam Levine, Esq. DANIEL MARKS, ESQ. Nevada State Bar No. 002003 | /s/ Jason R. Maier. Esq. JOSEPH A GUTIERREZ, ESQ. Nevada State Bar No. 009046 |
| 7 | ADAM LEVINE, ESQ. Nevada State Bar No. 004673 | JASON R. MAIER, ESQ. Nevada State Bar No. 008557 |
| 8 | 610 South Ninth Street Las Vegas, Nevada 89101 | 8816 Spanish Ridge Avenue Las Vegas, Nevada 89148 |
| 9 | Attorneys for Plaintiff Anthony Russo | Attorneys for Plaintiff Daniel M. Burgess |
| 10 | | |
| 11 | DATED this 10th day of July, 2017. | |
| 12 | GREENBERG TRAURIG, LLP | |
| 13 | /c/ Vara P. Handricks Esa | |
| 14 | /s/ Kara B. Hendricks, Esq. , MARK E. FERRARIO, ESQ. Nevada State Bar No. 001625 | |
| 15 | KARA B. HENDRICKS, ESQ. Nevada State Bar No. 007743 | |
| 16 | 3773 Howard Hughes Parkway Suite 400 North | |
| 17 | Las Vegas, Nevada 89169 Attorneys for Defendants | |
| 18 | Anomeys for Defendants | |
| 19 | IT IS SO ORDERED. | |
| 20 | | Cantack |
| 21 | $\overline{\mathbf{U}}$ | NITED STATES MAGISTRATE JUDGE |
| 22 | D | ATED this 11th day of July, 2017. |
| 23 | | |